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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANKLIN GODWIN (AKA
DOUGLAS POWER),
OSARUYI ENAZENA,
IDOWU ABDULWAHAB,
DIANNA BRIGGS (AKA DIANNA
MCGHEE, DIANNA GRIGGS,
DIANNA HIRIS, DIANNA
AZORAH, TRINA OBIKA), and
KATHLEEN WATANABE,

Defendants.

INDICTMENT

1 : 16 CR 176

CASE NO. **JUDGE ADAMS**

Title 18, United States Code,
Sections 1349 and 1028A(a)(1)

I. GENERAL ALLEGATIONS

The Grand Jury charges:

At all times relevant to this Indictment:

1. Defendant FRANKLIN GODWIN (AKA DOUGLAS POWER) was a resident of Ontario, Canada.
2. Defendant OSARUYI ENAZENA was a resident of Ontario, Canada.
3. Defendant IDOWU ABDULWAHAB was a resident of Ontario, Canada.

4. Defendant DIANNA BRIGGS (AKA DIANNA MCGHEE, DIANNA GRIGGS, DIANNA HIRRISS, DIANNA AZORAH, TRINA OBIKA) was a resident of California.

5. Defendant KATHLEEN WATANABE was a resident of Hawaii.

II. FACTUAL ALLEGATIONS

A. Commercial Mail Receiving Agencies

6. A Commercial Mail Receiving Agency ("CMRA") operates as a Private Mail Box Operator. Examples of CMRAs include UPS stores, Pak Mail stores, Post Net stores, and Mail Boxes Etc. stores.

7. A renter of a CMRA mailbox can receive mail and other deliveries at the business address of the CMRA rather than at the renter's own home address. Depending on the agreement between the renter and the CMRA, the CMRA can also forward mail to the renter at another address of the renter's choice.

8. In order to rent a mailbox at a CMRA store, renters are typically required to complete a Mailbox Service Agreement, which includes the customer's name, physical address, email address, and telephone number. The renter is able to send the completed form to the CMRA store electronically, via email or fax. In addition to completing the Mailbox Service Agreement, CMRA customers typically must provide two forms of identification. Photocopies of the identification documents can be sent to the CMRA store electronically, via fax or email.

B. Overview of the Conspiracy

9. Defendants and other conspirators (the "conspirators") agreed to engage and did engage in a scheme to defraud by fraudulently establishing or taking over accounts of financial institution customers and using CMRAs throughout the United States and Canada to fraudulently

obtain customer financial documents, including credit cards, debit cards, and checks, in order to make substantial unauthorized transactions on the accounts.

10. The conspirators stole and otherwise fraudulently obtained, without lawful authority, the personal identification information (“PII”) of customers of various financial institutions, as defined under Title 18, United States Code, § 20, including, *inter alia*, JP Morgan Chase Bank, N.A. (“Chase Bank”), Bank of America (“BOA”), U.S. Bank, Fifth Third Bank, BBVA Compass Bank, Wells Fargo Bank (“Wells Fargo”), Pentagon Federal Credit Union (“Pentagon FCU”), USAA, Barclays Bank, Citibank, Navy Federal Credit Union (“Navy FCU”), Capital One, and BMO Harris Bank (collectively referred to hereinafter as “the financial institutions”).

11. The conspirators used the stolen PII to create and attempt to create, without lawful authority, account applications submitted to the financial institutions to open fraudulent financial accounts. In connection with said fraudulent account applications, the conspirators used addresses of dozens of CMRA stores located throughout the United States, including the Northern District of Ohio, at which the conspirators rented mailboxes using various fraudulent United States and Canadian identification documents.

12. After establishing the fraudulent financial accounts, the conspirators requested that the financial institutions send financial documents, including credit and debit cards, checks, and financial account statements, to the CMRA addresses listed for the fraudulently-created accounts. The conspirators also directed the CMRA stores to forward received mail—which included fraudulently obtained financial documents—to other CMRA stores located in Ontario, Canada.

13. The conspirators subsequently retrieved the fraudulently obtained financial documents from the CMRA locations in Ontario, Canada, which they used to make unauthorized transactions on the fraudulently opened accounts thereby defrauding the financial institutions.

14. In addition to establishing new fraudulent financial accounts, the conspirators also fraudulently accessed and assumed control over existing, legitimate financial accounts by contacting the financial institutions that maintained the accounts, representing themselves as the actual customers. The conspirators then requested the financial institutions to send duplicate/ replacement credit and/or debit cards to alternative addresses, which were actually the addresses of either: (a) CMRA stores located in the United States; (b) CMRA stores located in Ontario, Canada; or (c) hotels and resorts located in Southern California, Hawaii, and Nevada.

15. Defendants and other co-conspirators conspired to defraud and, in fact, defrauded the financial institutions in the following ways: (a) conducting unauthorized ATM transactions; (b) obtaining unauthorized cash advances; (c) initiating unauthorized wire transfers of funds; (d) depositing fraudulent checks into accounts and subsequently withdrawing funds from the accounts; and (e) making fraudulent purchases at retail stores and online purchases with funds from said accounts.

16. Defendants and other co-conspirators obtained, without lawful authority, the PII of more than 50 individuals and caused the financial institutions to suffer losses totaling more than \$500,000, all in violation of Title 18, United States Code, Section 1349.

COUNT 1
**(Conspiracy to Commit Mail Fraud, Wire Fraud
and Bank Fraud, in violation of 18 U.S.C. § 1349)**

The Grand Jury further charges:

17. The allegations contained in paragraphs 1 through 16, are re-alleged and incorporated as though fully set forth herein.

18. From in or around 2010, through in or around January 2015, the exact dates being unknown to the Grand Jury, within the Northern District of Ohio, Eastern Division, and elsewhere, Defendants FRANKLIN GODWIN (AKA DOUGLAS POWER), OSARUYI ENAZENA, IDOWU ABDULWAHAB, DIANNA BRIGGS (AKA DIANNA MCGHEE, DIANNA GRIGGS, DIANNA HIRRISS, DIANNA AZORAH, TRINA OBIKA), and KATHLEEN WATANABE, together with others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with others both known and unknown to the Grand Jury, to commit federal criminal offenses, to wit:

a. To devise and intend to devise a scheme and artifice to defraud federally-insured financial institutions and to obtain money by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did deposit and cause to be deposited, any matter or thing whatever to be sent or delivered by the U.S. Postal Service and any private or commercial interstate carrier, and did take and receive therefrom, any such matter or thing, and did knowingly cause same to be delivered by U.S. Mail and private or commercial carrier according to the direction thereon, in violation of Title 18, United States Code, Section 1341 (Mail Fraud);

b. To devise and intend to devise a scheme and artifice to defraud federally-insured financial institutions and to obtain money by means of false and fraudulent pretenses,

representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause the transmission by means of wire communications in interstate and foreign commerce, any writing, sign, signal, and picture, in violation of Title 18, United States Code, Section 1343 (Wire Fraud); and

c. To execute and attempt to execute a scheme or artifice to defraud a federally-insured financial institution and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises, in violation of Title 18, United States Code, Section 1344 (Bank Fraud), all in violation of Title 18, United States Code, Section 1349.

OBJECTS OF THE CONSPIRACY

19. The objects of the conspiracy were: (a) to defraud financial institutions; (b) obtain financial institutions' customers' financial PII without authorization through theft and other means; (c) take-over existing accounts and open new financial accounts and lines of credit without customer authorization; and (d) enrich the conspirators.

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that:

20. The conspirators obtained financial institution customers' PII with the intent to further the objects of the conspiracy.

21. The conspirators used the stolen customer PII to rent mailboxes at CMRAs located throughout the United States, including the Northern District of Ohio and Canada.

22. The conspirators used false identification documents to rent mailboxes at the CMRAs.

23. The conspirators contacted financial institutions, purporting to be actual customers, when in fact they were not, in order to take over control of existing accounts and to establish new financial accounts.

24. The conspirators, without authorization or lawful authority, caused customers' financial documents and other sensitive financial information to be sent to CMRAs for subsequent retrieval and use by the conspirators.

25. The conspirators caused CMRAs in the United States, including CMRAs located in the Northern District of Ohio, to forward the fraudulently obtained financial documents and other sensitive financial information to CMRAs in Canada, to be used by the conspirators to defraud the financial institutions.

26. The conspirators, without authorization or lawful authority, caused customers' financial documents and other sensitive financial information to be sent to hotels and CMRAs throughout the United States for subsequent retrieval and fraudulent use by the conspirators.

27. The conspirators defrauded and intended to defraud the financial institutions in the following manner: (a) conducting unauthorized ATM transactions; (b) obtaining unauthorized cash advances; (c) initiating and receiving unauthorized wire transfers of funds; (d) depositing fraudulent checks into accounts and subsequently withdrawing funds; and (e) conducting fraudulent transactions for merchandise at retail stores and through online transactions.

28. It was further part of the conspiracy that:

a. On or about August 17, 2010, the conspirators created the email account Abum27@yahoo.com, providing the name "Mr. Douglas Power" as the user's name and the phone number XXX-XXX-9254 (redacted).

b. On or about February 6, 2012, the conspirators rented CMRA Mailbox #287 located at UPS Store, 9251 Yonge Street, Richmond Hills, Ontario, Canada, L4C9T3 (hereinafter, "Mailbox #287"), and provided the email address Phew9511@gmail.com.

c. On or about March 9, 2012, the conspirators submitted a fraudulent USAA credit card application in the name of P.S. (a real person whose identity is known to the Grand Jury), and provided the address for CMRA Mailbox #246 at 5018 Antoine Drive, Houston, Texas 77092 (hereinafter, "Mailbox #246").

d. On or about February 4, 2013, the conspirators rented CMRA Mailbox #139 in the name of K.D. located at C4-233 Cross Avenue, Oakville, Ontario, Canada L6J2W9 (hereinafter, "Mailbox #139"), using a fraudulent Ontario, Canada driver's license, XXX-96030 (redacted) (hereinafter, the "K.D. license").

e. On or about February 4, 2013, the conspirators rented CMRA Mailbox #192 in the name of R.H. (a real person whose identity is known to the Grand Jury) located at 3867 West Market Street, Fairlawn, OH 44333 (hereinafter, "Mailbox #192"), in the Northern District of Ohio, using a fraudulent Ontario, Canada driver's license, XXX80625 (redacted), bearing the name of R.H., and further provided the address of the CMRA containing Mailbox #139.

f. On or about February 7, 2013, the conspirators rented CMRA Mailbox #106 in the name of K.D. located at 3055 Dundas Street West, #3, Mississauga, Ontario, Canada L5LR8 (hereinafter "Mailbox #106"), using the fraudulent K.D. license.

g. On or about June 20, 2013, the conspirators, using bluenote-entertainment@hotmail.com, emailed to Phew9511@gmail.com a copy of a fraudulent Minnesota driver's license, XXX5234 (redacted) (hereinafter, the "K.M.N. license").

h. On or about July 23, 2013, the conspirators rented CMRA Mailbox #180 located at 10324 China Springs Road, Waco, Texas 76708 (hereinafter, "Mailbox #180"), using the fraudulent K.M.N. Minnesota driver's license.

i. On or about July 24, 2013, the conspirators rented CMRA Mailbox #102 at 30628 Detroit Road, Westlake, Ohio 44145, in the Northern District of Ohio (hereinafter, "Mailbox #102"), using a fraudulent Ontario, Canada driver's license, XXX51015 (redacted), bearing the name of J.L. (a real person whose identity is known to the Grand Jury).

j. On or about July 25, 2013, the conspirators fraudulently established a Bank of America account, XXX3929 (redacted), in the name of R.H. (a real person whose identity is known to the Grand Jury), using the address for Mailbox #192.

k. On or about February 12, 2014, the conspirators contacted U.S. Bank, falsely purporting to be J.H. (a real person whose identity is known to the Grand Jury), and requested an emergency replacement credit card in the name of J.H. be sent to CMRA Mailbox #146, 34194 Aurora Road, Solon, Ohio 44139, in the Northern District of Ohio (hereinafter, "Mailbox #146").

l. On or about March 17, 2014, the conspirators rented Mailbox #177 in the name of T.F. at 3766 Fishcreek Road, Stow, Ohio 44224, in the Northern District of Ohio (hereinafter, "Mailbox #177"), using a fraudulent Ontario, Canada driver's license, XXX41023 (redacted), in the name T.F.

m. On or about July 2, 2014, the conspirators received an email addressed to Phew9511@gmail.com, which contained an image of a fraudulent Texas driver's license, XXX8996, in the name of L.R. (a real person whose identity is known to the Grand Jury) (hereinafter, the "L.R. Texas driver's license").

n. On or about July 7, 2014, the conspirators rented CMRA Mailbox #121, in the name of L.R., located at 2780 E. Fowler Avenue, Tampa, Florida 33612 (hereinafter “Mailbox #121”), using the L.R. Texas driver’s license.

o. On or about the following dates, the conspirators caused packages to be forwarded to Mailbox #183 at a CMRA located at 4981 Highway 7 East, Unit 12A, Markham, Ontario, Canada L3R 1N1 (hereinafter, “Mailbox #183”), as set forth below:

Approximate Date	Originating CMRA Address
July 20, 2014	UPS Store 7652 Sawmill Road, #233 Dublin, OH 43016
July 25, 2014	UPS Store Mailbox #132 441 W. Bagley Road Berea, OH 44017
July 25, 2014	UPS Store Mailbox #112 1421 Lexington Avenue Mansfield, OH 44907
July 25, 2014	UPS Store 4532 W. Kennedy Blvd Tampa, FL 33609
July 25, 2014	UPS Store Mailbox #170 3593 Medina Road Medina, OH 44256
July 28, 2014	UPS Store Mailbox #192 3867 W. Market Street Akron, OH 44333
July 30, 2014	Pak Mail Store Mailbox #121 2780 E. Fowler Avenue Tampa, FL 33612

p. Between on or about July 25, 2014, and on or about July 30, 2014, the conspirators sent emails to five (5) separate CMRAs, including several CMRAs in the Northern District of Ohio, and instructed the CMRAs to forward received mail to Mailbox #183.

q. On or about August 19, 2014, the conspirators purchased, and caused to be purchased, United Airline tickets for Flights #235 and #468 using a Chase Bank credit card, XXX7141 (redacted), issued in the name of D.R. #1 (a real person whose identity is known to the Grand Jury).

r. On or about August 25, 2014, the conspirators purchased, and caused to be purchased, an American Airlines ticket for WATANABE for Flight #31 using a Chase Bank credit card, XXX7610 (redacted), issued in the name of M.O.D. (a real person whose identity is known to the Grand Jury).

s. On or around September 12, 2014, the conspirators purchased, and caused to be purchased, United Airlines tickets for WATANABE for flights #460 and #663 using a Chase Bank credit card, XXX2739 (redacted), issued in the name of D.R. #2 (a real person whose identity is known to the Grand Jury).

t. On or about December 18, 2014, the conspirators reserved a motel room in the name of K.M. (a real person whose identity is known to the Grand Jury) for the period from December 19, 2014, through December 23, 2014, at the Extended Stay America motel located at 1400 E. Tahquitz Canyon Way, Palm Springs, California 92262, and provided the contact email address bluenote-entertainment@hotmail.com.

ACTS IN FURTHERANCE OF THE CONSPIRACY

29. In furtherance of the conspiracy, and to effect its unlawful objects, Defendants and their co-conspirators committed, and caused to be committed, the following acts in furtherance of the conspiracy in the Northern District of Ohio, and elsewhere:

a. On or about March 8, 2012, BRIGGS and other co-conspirators rented Mailbox #246 in the names of P.S. (a real person whose identity is known to the Grand Jury) and M.H., using a fraudulent Ontario, Canada, driver's license bearing the name of M.H., driver's license #XXX-01130 (the "M.H. Ontario driver's license"), and further providing the address for Mailbox #287 and the email address Abum27@yahoo.com.

b. On or about March 30, 2012, BRIGGS and other co-conspirators rented CMRA Mailbox #158 in the names of P.S. and M.H. located at 115 West California Blvd., Pasadena, California 91105 (hereinafter "Mailbox #158"), using the fraudulent M.H. Ontario driver's license and provided the address for Mailbox #287.

c. On or about April 11, 2012, BRIGGS and other co-conspirators contacted USAA by telephone, falsely purporting to be K.N. (a real person whose identification is known to the Grand Jury), to falsely report that a USAA credit card issued in the name of K.N., account number XXX7659 (redacted), was lost and requested that a replacement USAA credit card be mailed to Mailbox #158.

d. On or about April 16, 2012, BRIGGS conducted unauthorized ATM cash withdrawals using a USAA credit card issued in the name of K.N.

e. On or about May 5, 2012, S.H.T., a co-conspirator not charged herein, retrieved fraudulently obtained financial documents from Mailbox #158.

- f. On or about February 27, 2014, ABDULWAHAB retrieved mail from Mailbox #139.
- g. On or about February 27, 2014, ABDULWAHAB possessed:
 - i. a handwritten note which contained the PII of J.H., as well as the account number of the U.S. Bank account for which an emergency replacement card had been sent to Mailbox #146;
 - ii. a UPS invoice reflecting that a package was shipped to Mailbox #139 by R.H., from the CMRA containing Mailbox #192; and
 - iii. a UPS invoice reflecting that a package was shipped to the CMRA Mailbox #330, located at 60 Bristol Road East, Unit 8, Mississauga, Ontario, Canada L4Z-3K8.
- h. On or about February 28, 2014, BRIGGS telephoned Fifth Third Bank and, without authorization or lawful authority, established a credit card account, XXX7135 (redacted), in the name of M.S. (a real person whose identity is known to the Grand Jury), and BRIGGS provided the address of a CMRA located at 1580 Sawgrass Corporate Parkway, Sunrise, Florida 33323.
 - i. Between on or about March 22, 2014 and on or about July 31, 2014, ENAZENA, purporting to be "Juan Flore," retrieved packages delivered to Mailbox #106.
 - j. Between on or about March 28, 2014, and on or about April 6, 2014, ENAZENA and other co-conspirators, using a debit card issued in the name of M.S. (a real person whose identity is known to the Grand Jury), made unauthorized ATM cash withdrawals in Canada from a Fifth Third Bank account, XXX7135 (redacted).

k. On or about April 11, 2014, GODWIN rented Mailbox #127 in the name of "Douglas Power" at a CMRA located 7-8362 Woodbine Avenue, Unionville, Ontario, Canada L3R 2M6 (hereinafter, "Mailbox #127"). GODWIN provided a fraudulent Ontario, Canada driver's license bearing the name of "Douglas Power," but displaying a photograph of GODWIN. GODWIN further provided the email address Abum27@yahoo.com and the telephone number XXX-XXX-9254 (redacted), (the same telephone number previously used during the registration of the email address Abum27@yahoo.com).

l. On or about April 11, 2014, GODWIN rented Mailbox #183 in the name of Douglas Power, at a CMRA located at 4981 Highway 7 East, Unit 12A, Markham, Ontario, Canada L3R 1N1. In renting Mailbox #183, GODWIN used the same fraudulent identification documents used to rent Mailbox #127.

m. On or about April 19, 2014, BRIGGS telephoned Fifth Third Bank, without authorization or lawful authority, to establish a credit card account, XXX6177 (redacted), in the name of C.S. (a real person whose identity is known to the Grand Jury). BRIGGS provided the address for the CMRA at 2385 NW Executive Center Drive, Boca Raton, Florida 33431.

n. Between on or about April 17, 2014, and on or about April 22, 2014, GODWIN and other co-conspirators, using Abum27@yahoo.com, caused email messages to be sent to the CMRA stores for Mailbox #183 and Mailbox #127, and provided the contact telephone number XXX-XXX-9254 (redacted).

o. On or about June 15, 2014, BRIGGS and other co-conspirators, without authorization and lawful authority, submitted a fraudulent application for a new Chase Bank account in the name of A.Z. (a real person whose identity is known to the Grand Jury). The

address listed was a CMRA located at 1126 S. Federal Highway, Mailbox #108, Fort Lauderdale, Florida 33316 (hereinafter, "Mailbox #108").

p. On or about June 23, 2014, BRIGGS and other co-conspirators faxed a fraudulent Earnings Statement to Chase Bank in connection with the then-pending account application for A.Z. The fraudulent Earnings Statement displayed the name A.Z. and listed the CMRA address for Mailbox #108 as A.Z.'s address.

q. On or about June 27, 2014, BRIGGS telephoned Chase Bank and requested a status update for the Chase Bank account application BRIGGS had previously submitted using the name A.Z. During the telephone call, BRIGGS provided the address for Mailbox #108.

r. On June 28, 2014, ABDULWAHAB and other co-conspirators telephoned, and caused telephone calls to be made to, four (4) CMRAs located in the Northern District of Ohio, and on that same date, rented, and caused to be rented, mailboxes using various individuals' names, without authorization, as set forth below:

CMRA Store	Mailbox Number	Name in which Mailbox Opened
3593 Medina Road Medina, OH 44256	170	L.L. (redacted)
1421 Lexington Avenue Mansfield, OH 44907	112	D.B. (redacted)
441 W. Bagley Road Berea, OH 44017	132	W.L.L. (redacted)
4758 Ridge Road Brooklyn, OH 44144	155	S.R. (redacted)

s. On or about July 5, 2014, BRIGGS telephoned Chase Bank and requested, without authorization and lawful authority, that a duplicate/replacement card for the account maintained in the name of D.T. (a real person whose identity is known to the Grand Jury), be sent to Mailbox #127.

t. On or about July 11, 2014, BRIGGS telephoned Chase Bank and, without authorization and lawful authority, requested an emergency replacement card for the account maintained in the name of R.S. (a real person whose identity is known to the Grand Jury) be sent to Mailbox #183.

u. On or about July 31, 2014, ABDULWAHAB and ENAZENA retrieved packages from Mailbox #183 which contained fraudulently-obtained financial documents in the names of various individuals, including, but not limited to: R.H., L.R., P.L., L.L., D.B., W.L., S.N., S.S., and J.G. (real persons whose identities are known to the Grand Jury).

v. On or about July 31, 2014, ABDULWAHAB and ENAZENA possessed keys which opened Mailbox #183 and Mailbox #127.

w. On or about July 31, 2014, ENAZENA possessed a Bank of America debit card, XXX5914 (redacted), issued in the name of A.Z. (a real person whose identity is known to the Grand Jury).

x. On or around July 31, 2014, ABDULWAHAB and ENAZENA possessed an envelope addressed to Mailbox #121, containing a Discover Card, XXX7382 (redacted), issued in the name of L.R.

y. On or about August 9, 2014, BRIGGS conducted an unauthorized ATM transaction using a Discover Card, XXX7382 (redacted), issued in the name of L.R.

z. Between on or about August 19, 2014, and August 20, 2014, WATANABE flew on United Airlines Flight #235 from Honolulu, Hawaii, to San Francisco, California, using a ticket fraudulently purchased with the Chase Bank credit card issued in the name of D.R. #1.

aa. On or about August 20, 2014, WATANABE flew on United Airlines Flight #468 from San Francisco, California, to Phoenix, Arizona, using a ticket fraudulently purchased with the Chase Bank credit card issued in the name of D.R. #1.

bb. Between on or about August 22, 2014, and August 23, 2014, WATANABE, without authorization and lawful authority, conducted two (2) separate cash advance transactions on a Chase Bank account maintained in the name of M.O.D. (a real person whose identity is known to the Grand Jury) at a Bank of America branch located in Palm Springs, California.

cc. On or about August 28, 2014, BRIGGS telephoned Chase Bank and, without authorization and lawful authority, requested that an emergency replacement card issued in the name N.L. (a real person whose identity is known to the Grand Jury) be sent to a hotel in Las Vegas, Nevada. In connection with this request, BRIGGS fraudulently used N.L.'s PII, including N.L.'s name, date of birth, and the last four digits of N.L.'s Social Security number.

dd. On or about September 3, 2014, WATANABE conducted an unauthorized ATM withdrawal of \$800 from the Chase Bank account, XXX8836 (redacted), issued in the name of N.L.

ee. On or about September 4, 2014, BRIGGS telephoned Chase Bank and, without authorization and lawful authority, requested the email account Abum27@yahoo.com be added as contact information to the Chase Bank account issued in the name of D.F. (a real person

whose identity is known to the Grand Jury). BRIGGS further requested that an emergency replacement card in the name of D.F. be sent to a hotel in Palm Springs, California.

ff. On or about September 9, 2014, WATANABE rented Mailbox #7291, using the name of M.H. (a real person whose identity is known to the Grand Jury), located at 611 S. Palm Canyon Drive, Palm Springs, CA 92264 (hereinafter, "Mailbox #7291"). In renting said mailbox, WATANABE, used, without lawful authority, a fraudulent Virginia driver's license, number XXX311 (redacted), displaying the name of M.H. and a photograph of WATANABE, as well as a Progressive Insurance Identification card, policy number XXX562-0 (redacted), issued in the name of M.H.

gg. On or about September 9, 2014, BRIGGS telephoned Chase Bank and, without authorization and lawful authority, requested that an emergency replacement card for bank account XXX7441 (redacted), issued in the name of D.A., be sent to Mailbox #7291.

hh. On or about September 11, 2014, WATANABE, without authorization and lawful authority, conducted a \$4,000.00 cash advance from Chase Bank account, XXX7441 (redacted), issued in the name of D.A.

ii. On or about September 15, 2014, BRIGGS sent a text message to WATANABE containing the email address "Abum27 yahoo discover9511[.]"

jj. Between on or about September 19, 2014, and September 20, 2014, WATANABE conducted unauthorized ATM cash withdrawals from a Bank of America account issued in the name of D.A.

kk. Between on or about December 19, 2014, and on or about December 23, 2014, WATANABE stayed at the Extended Stay America motel located in Palm Springs, California, registered under the name of K.M.

ll. On or around December 23, 2014, BRIGGS and other co-conspirators contacted a Macy's Department store in Palm Desert, California, and requested items be set aside for purchase by D.R. #3.

mm. On or around December 23, 2014, BRIGGS and WATANABE travelled to a Macy's Department store in Palm Desert, California, and made unauthorized purchases using a Macy's account belonging to D.R. #3. At the time of purchase, WATANABE provided a Florida driver's license displaying the name of D.R. #3.

nn. On or about December 24, 2014, WATANABE possessed two fraudulent California and Florida driver's licenses which displayed the names of K.M. and D.R. #3 and the photographs of WATANABE.

oo. On or about December 24, 2014, BRIGGS possessed fraudulently obtained merchandise that WATANABE purchased at the Macy's Department store in Palm Springs, California, all in violation of Title 18, United States Code, Section 1349.

COUNT 2
(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

30. The allegations contained in paragraphs 1 through 16, and 20 through 29, inclusive, are re-alleged and incorporated as though fully set forth herein.

31. On or about July 31, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, OSARUYI ENAZENA, during and in relation to felony violations of Title 18, United States Code, Sections 1341, 1343, 1344, and 1349, knowingly transferred, possessed, and used, without lawful authority, a means of identification of A.Z., R.H., L.R., P.L., L.L., D.B., S.N., S.S., and J.G. (real persons whose identities are known to the Grand Jury), knowing that said

means of identification belonged to another person, all in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 3
(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

32. The allegations contained in paragraphs 1 through 16, and 20 through 29, inclusive, are re-alleged and incorporated as though fully set forth herein.

33. On or about August 28, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, DIANNA BRIGGS (AKA DIANNA MCGHEE, DIANNA GRIGGS, DIANNA HIRRISS, DIANNA AZORAH, TRINA OBIKA), during and in relation to felony violations of Title 18, United States Code, Sections 1341, 1343, 1344, and 1349, knowingly transferred, possessed, and used, without lawful authority, a means of identification of N.L. (a real person whose identity is known to the Grand Jury), knowing that said means of identification belonged to another person, all in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 4
(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

34. The allegations contained in paragraphs 1 through 16, and 20 through 29, inclusive, are re-alleged and incorporated as though fully set forth herein.

35. On or about September 9, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, KATHLEEN WATANABE, during and in relation to felony violations of Title 18, United States Code, Sections 1341, 1343, 1344, and 1349, knowingly transferred, possessed, and used, without lawful authority, a means of identification of M.H. (a real person

whose identity is known to the Grand Jury), knowing that said means of identification belonged to another person, In violation of Title 18, United States Code, Sections 1028A(a)(1).

Original document - - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002